

Message

From: Michael Dourson [dourson@tera.org]
Sent: 5/14/2019 1:21:26 PM
To: var1@columbia.edu; rmw5@columbia.edu
CC: officeofthepresident@columbia.edu; Dunn, Alexandra [dunn.alexandra@epa.gov]; Kunickis, Sheryl - OSEC [Sheryl.Kunickis@osec.usda.gov]; Jones, Danielle Y. EOP/OMB [Danielle_Y_Jones@omb.eop.gov]; senator_jbarrasso@barrasso.senate.gov; csmith@gowanco.com; Ray McAllister [rmcallister@croplifeamerica.org]; Pat McGinnis [mcginnis@tera.org]; Bernard Gadagbui [gadagbui@tera.org]
Subject: Re: Chlorpyrifos
Attachments: Dourson et al., SOT 2019 Chlorpyrifos Poster.pptx

Dear Professors Rauh and Whyatt

As shown in several emails below, our team has asked for your publicly-funded data to explore the idea suggested by your publication that neurological deficits are the first adverse effect of chlorpyrifos, rather than the broadly accepted blood enzyme change of cholinesterase inhibition. As you know, this latter effect is used by health agencies throughout the world to develop chlorpyrifos' safe dose, which forms the basis, in part, of its regulation. As you also know, your studies merely suggest this idea, but are otherwise in no way definitive, due to limits in the underlying methods of your study design. Moreover, we have not been able to confirm your work, using the information available in your published studies as shown on the attached scientific presentation.

We have developed our presentation into a journal article that we plan to submit in the next several weeks. We will let you know when it gets published so as to afford you the opportunity to consider a letter to the editor as appropriate.

Sincerely,

Michael Dourson, PhD, DABT, FATS, FSRA



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On Apr 30, 2019, at 8:29 AM, Michael Dourson <dourson@tera.org> wrote:

Dear Professor Rauh

As mentioned in the attached presentation, we have not been able to replicate your findings published in 2011, specifically, "Seven-Year Neurodevelopmental Scores and Prenatal Exposure to Chlorpyrifos, a Common Agricultural Pesticide, Environmental Health Perspectives, Volume 119: 1196-1201." Therefore, we again respectfully request access to your data, consistent with the restrictions of your funding organizations.

For example, your published page 1196 states for funding sources :

"This study was supported by the National Institute of Environmental Health Sciences (grants 5P01ES09600, P50ES015905, and 5R01ES08977), the U.S. Environmental Protection Agency (grants R827027, 8260901, and RR00645), the Educational Foundation of America, the John and Wendy Neu

Family Foundation, the New York Community Trust, and the Trustees of the Blanchette Hooker Rockefeller Fund.”

As you know, funding source restrictions in part are found at <https://grants.nih.gov/policy/sharing.htm>, specifically, [NIH Sharing Policies and Related Guidance on NIH-Funded Research Resources | grants.nih.gov - OER Home Page | grants.nih.gov grants.nih.gov](#), where it states:

It is NIH policy that the results and accomplishments of the activities that it funds should be made available to the public. PIs and funding recipient institutions are expected to make the results and accomplishments of their activities available to the research community and to the public at large.

Funding source restrictions in part are also found at https://www.epa.gov/sites/production/files/2018-11/documents/fy_2019_epa_general_terms_and_conditions_effective_october_1_2018_or_later.pdf, where it states:

34.1.2 Prohibit all recipient employees, contractors, and program participants, including scientists, managers, and other recipient leadership, from suppressing, altering, or otherwise impeding the timely release of scientific findings or conclusions....

34.2.6 Make scientific information available online in open formats in a timely manner, including access to data and non-proprietary models.

As before, we would be willing to receive a coded data set, whereby individuals are not identified so as to protect confidentiality but all findings are available.

Sincerely,

Michael L. Dourson, Ph.D., DABT, FATS, FSRA
Director of Science

Patricia G. McGinnis, Ph.D., DABT
President

Toxicology Excellence For Risk Assessment
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On Apr 16, 2019, at 2:19 PM, Michael Dourson <dourson@tera.org> wrote:

Dear Professor Rauh

This is a follow up to our earlier email below this note requesting information regarding your study published in 2011, specifically, "Seven-Year Neurodevelopmental Scores and Prenatal Exposure to Chlorpyrifos, a Common Agricultural Pesticide, Environmental Health Perspectives, Volume 119: 1196-1201." We again respectfully request access to your data. As before, if you are more comfortable sending a coded data set, whereby individuals are not identified so as to protect confidentiality but all findings are available, that would also be appreciated.

Sincerely,

Michael L. Dourson, Ph.D., DABT, FATS, FSRA
Director of Science

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On Apr 3, 2019, at 1:42 PM, Michael Dourson <dourson@tera.org> wrote:

Dear Professor Rauh

Staff of our nonprofit organization, Toxicology Excellence for Risk Assessment (TERA), has studied the toxicology of chlorpyrifos for several years, working with EPA, consulting, and industry scientists along the way. We recently relooked at some of your work in more detail, specifically Rauh et al. (2011). Seven-Year Neurodevelopmental Scores and Prenatal Exposure to Chlorpyrifos, a Common Agricultural Pesticide, Environmental Health Perspectives, Volume 119: 1196-1201.

The attached presentation of ours was given at last month's Society of Toxicology's annual meeting. Here, we explore in part some of your findings in relationship to the current critical effect of chlorpyrifos, that of cholinesterase inhibition. Unfortunately, we were not able to confirm your findings, in part because of the absence of data. Although we received many positive comments on our work, a common comment was surprise that your full data were not available for confirmation.

Therefore, we request access to your full data set so we can do further peer review. Alternatively, if you are more comfortable sending a coded data set, whereby individuals are not identified so as to protect confidentiality but all findings are available, that would also be appreciated.

Sincerely,

Michael L. Dourson, Ph.D., DABT, FATS, FSRA
Director of Science

Patricia G. McGinnis, Ph.D., DABT
President

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